

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
WORCESTER DIVISION

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DONALD P. SPEAKMAN, STEPHEN H.	§	
WEDEL and MARK L. ROBARE,	§	
Individually and On Behalf of All Others	§	
Similarly Situated,	§	
	§	
Plaintiffs,	§	
	§	Civil Action No. 4:04-cv-40077-FDS
v.	§	
	§	
ALLMERICA FINANCIAL LIFE INS. &	§	
ANNUITY CO., FIRST ALLMERICA	§	
FINANCIAL LIFE INS. CO. and	§	
ALLMERICA FINANCIAL CORP.	§	
	§	
Defendants	§	

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**PLAINTIFFS' MOTION FOR LEAVE TO FILE**  
**REPLY MEMORANDUM IN SUPPORT OF PLAINTIFFS'**  
**MOTION FOR ENTRY OF PROTECTIVE ORDER CONCERNING**  
**CONFIDENTIALITY OF DOCUMENTS AND INFORMATION**

Now come Plaintiffs and move this Court for leave to file the attached Reply Memorandum in Support of Plaintiffs' Motion for Protective Order Concerning Confidentiality of Documents and Information. In support thereof, Plaintiffs state that the additional matter contained in the Reply Memorandum will aid the Court in its adjudication of the pending Motion.

Dated September 22, 2005.

Respectfully submitted,

**MOULTON & GANS, P.C.**

By: /s/ Nancy Freeman Gans

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***ATTORNEYS FOR PLAINTIFFS***

**LOCAL RULE 7.1(A)(2) CERTIFICATE**

I, Nancy Freeman Gans, Esquire, Moulton & Gans, P.C., counsel for Plaintiffs, hereby certify that on September 22, 2005, I tried to reach Jonathan A. Shapiro, Esquire, and Eric Levin, Esquire, Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Defendants, by telephone, regarding the within Motion in a good faith attempt to resolve or narrow the issues. Both are traveling and cannot be timely reached, so defendants have taken no position with respect to this Motion.

/s/ Nancy Freeman Gans  
Nancy Freeman Gans

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by facsimile and first class mail on this the 22nd day of September, 2005, to the following attorneys for defendants:

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